

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

HEAVEN WHITE, Individually and on  
Behalf of her three minor children,  
et al.,

\*

\*

Plaintiffs,

\*

Civil Action No.: 1:19-cv-01442-CCB

v.

\*

THE CITY OF ANNAPOLIS,  
et al.,

\*

\*

Defendants.

\*

\* \* \* \* \*

**CITY OF ANNAPOLIS CONSENT DECREE**  
**JOINT CONSENT DECREE SUPPLEMENT NO. 1**  
**ADDRESSING PARAGRAPH 36**

Plaintiffs and the City of Annapolis, by and through their respective undersigned counsel, submit this Joint Consent Decree Supplement No. 1 addressing language in paragraph 36 of the City of Annapolis Consent Decree (hereinafter the “Consent Decree”), which also has an impact on paragraphs 16 and 35 of the Consent Decree, and state as follows:

1. In a status conference with the Court on Monday, December 28, 2020, the Court inquired of counsel for Plaintiffs and the City about language in paragraph 36 of the Consent Decree regarding the “roles identified in the preceding paragraph[.]” The Court correctly pointed out that there are no roles identified in paragraph 35, which is the preceding paragraph. The Court requested that the parties file a document outlining their agreed upon approach to the issue.

2. In paragraph 61 of the Consent Decree between Plaintiffs and the City of Annapolis, the parties agreed to “execute any supplementary documents and to take all supplementary steps necessary to give full force and effect to the terms” of the Consent Decree and the release contained therein. *See* Consent Decree, paragraph 61. This Consent Decree Supplement No. 1 is presented to the Court pursuant to paragraph 61 of the Consent Decree.

3. Plaintiffs and the City agree that above-referenced error in paragraph 36 is a result of language carried over from prior drafts of the decree and is no longer relevant.

4. The intent of Paragraph 36 is to require the City to train new City employees responsible for rental inspections on the City’s policies and procedures related to the same.

5. Plaintiffs and the City agree that paragraph 36 should be interpreted as if it is written in the following manner:

Within fifteen (15) days of employment, all new employees of any of the City roles identified in paragraph 16 of this Consent Decree will undergo the training identified in paragraph 16.<sup>1</sup>

6. Counsel for Plaintiffs have reviewed the City of Annapolis Joint Consent Decree Supplement No. 1, agreed to it, and authorized Counsel for the City to sign on their behalf and file it with the Court.

---

<sup>1</sup> For the Court’s ease of reference, paragraph 16 of the Consent Decree states:

Within sixty (60) days of the completion of the manual, the City will train its inspectors on the new protocols found under the Rental Licensing Policies and Procedures Manual, and prepare for inspections when permitted by the City’s declared COVID-19 State of Emergency.

Consent Decree, paragraph 16.

# The Donahue Law Firm

By: /s/  
P. Joseph Donahue, # 06245  
[pjd@thedonahuelawfirm.com](mailto:pjd@thedonahuelawfirm.com)

By:                     /s/                      
Lisa M. Sarro, # 14803  
[lsarro@thedonahuelawfirm.com](mailto:lsarro@thedonahuelawfirm.com)

The Donahue Law Firm  
18 West Street  
Annapolis, Maryland 21401  
(410) 280-2023  
(410) 280-0905 (Facsimile)  
*Attorneys for Plaintiffs*

Maryland Legal Aid –  
Anne Arundel County Office

By:                     /s/                      
Kathleen M. Hughes, #14892  
[khughes@mdlab.org](mailto:khughes@mdlab.org)

By: /s/  
Amy B. Siegel, #20983  
[asiegel@mdlab.org](mailto:asiegel@mdlab.org)

Maryland Legal Aid –  
Anne Arundel County Office  
P.O. Box 907  
Annapolis, Maryland 21404  
(410) 972-2700  
(410) 269-8916  
*Attorneys for Plaintiffs*

Karpinski, Cornbrooks &amp; Karp, P.A.

By: /s/  
E. I. Cornbrooks, IV, #28296  
[scornbrooks@bkcklaw.com](mailto:scornbrooks@bkcklaw.com)

By: \_\_\_\_\_ /s/  
Michael B. Rynd, #28765  
[mrynd@bkcklaw.com](mailto:mrynd@bkcklaw.com)

Karpinski, Cornbrooks & Karp, P.A.  
120 E. Baltimore Street, Suite 1850  
Baltimore, Maryland 21202  
(410) 727-5000  
(410) 727-0861 (Facsimile)  
*Attorneys for City of Annapolis*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 6th day of January, 2021, a copy of the foregoing was electronically filed, with notice to:

P. Joseph Donahue, Esquire  
Lisa M. Sarro, Esquire  
The Donahue Law Firm  
18 West Street  
Annapolis, Maryland 21401  
[pjd@thedonahuelawfirm.com](mailto:pjd@thedonahuelawfirm.com)  
[lmsarro@thedonahuelawfirm.com](mailto:lmsarro@thedonahuelawfirm.com)

Kathleen M. Hughes, Esquire  
Amy B. Siegel, Esquire  
Maryland Legal Aid  
Anne Arundel County Office  
P.O. Box 907  
Annapolis, Maryland 21404  
[khughes@mdlab.org](mailto:khughes@mdlab.org)  
[asiegel@mdlab.org](mailto:asiegel@mdlab.org)  
*Attorneys for Plaintiffs*

Carrie Blackburn Riley, Esquire  
Blackburn Riley, LLC  
222 Courthouse Ct.  
Baltimore, Maryland 21204  
[cbr@blackburnriley.com](mailto:cbr@blackburnriley.com)  
*Attorneys for Housing Authority of  
The City of Annapolis*

\_\_\_\_\_  
/s/  
Of Counsel for City of Annapolis